

FMC Corporation
1735 Market Street
Philadelphia, PA 19103

215.299.6000 phone
215.299.6468 fax
www.fmc.com

VIA FEDERAL EXPRESS

May 2, 2012

U.S. Environmental Protection Agency
Document Processing Desk (DCI/PRD)
Dana Friedman
Office of Pesticide Programs (7508P)
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Dear Ms. Friedman:

Subject: Chemical Number/Name: 109701/permethrin
Generic DCI, ID# GDCI-109701-1113

Chemical Number/Name: 129064/zeta-cypermethrin
Generic DCI, ID# GDCI-129064-1097

Chemical Number/Name: 109702/cypermethrin
Generic DCI, ID# GDCI-109702-1107

Chemical Number/Name: 128825/bifenthrin
Generic DCI, ID# GDCI-128825-1114

Residential Pyrethroid Use Information Data Call-In Response

FMC Corporation is submitting our 90-day response to the residential pyrethroid use information Data Call-In.

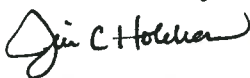
FMC has entered into an agreement with other pyrethroid registrants to form the Residential Exposure Joint Venture (REJV), which will be jointly developing data required under the DCI.

Enclosed, please find the following documents:

1. A letter from Susan Little of CSPA confirming FMC's membership in the REJV
2. Data Call-In Response Forms for each active

We trust that the enclosed information is acceptable for the Agency to process this request. If you have any questions, please call.

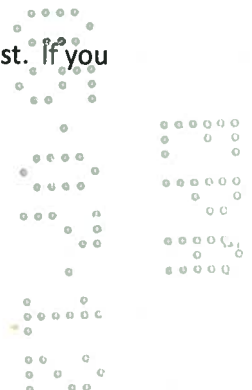
Sincerely,



Jill C. Holihan
Product Registration and Regulatory Affairs Manager
(215) 299-6436
jill.holihan@fmc.com



MAY 08 2012





Representing Household & Institutional Products

Aerosol - Air Care - Cleaners - Polishes
Automotive Care - Antimicrobial - Pest Management

April 3, 2012

John Cummings
FMC Corporation
701 PrincetonSouth Corporate Center
Ewing, NJ 8628

Re: REJV-Residential Exposure EPA Company # 74888

Dear Mr. Cummings,

This letter is written to confirm that FMC Corporation is a member in good standing of the Residential Exposure /Joint Venture (REJV) and has the right to rely on and cite all data developed by the REJV.

Data developed by the REJV are proprietary to the membership of the REJV and cannot be cited and/ or relied on without express written consent.

Please do not hesitate to contact me by phone 202-833-7315 or email at slittle@cspa.org if you have questions regarding this matter.

Sincerely,

A handwritten signature in black ink that reads "Susan E. Little". The signature is written in a cursive, flowing style.

Susan E. Little
Executive Director, PIR Program
For the Residential Exposure Joint Venture



United States Environmental Protection Agency
Washington, D.C. 20460
DATA CALL-IN RESPONSE

OMB Approval 2070-0174

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address

FMC CORP. AGRICULTURAL PRODUCTS GROUP
1735 MARKET ST, RM 1978
PHILADELPHIA, PA 19103

2. Case # and Name

2510 - Permethrin
Chemical # and Name: 109701
Permethrin

3. Date and Type of DCI and Number

01-Feb-2012
GENERIC
ID # GDCL-109701-1113

4. EPA Product Registration

5. I wish to cancel
this product
registration
voluntarily

6. Generic Data

6a. I am claiming a Generic Data
Exemption because I obtain the
active ingredient from the source
EPA registration number listed
below.

6b. I agree to satisfy Generic Data
Requirements as indicated on the
attached form entitled
"Requirements Status and
Registrant's Response."

7. Product Specific Data

7a. My product is an MUP and I
agree to satisfy the MUP
requirement on the attached form
entitled "Requirements Status and
Registrant's Response."

7b. My product is an EUP and I
agree to satisfy the EUP
requirement on the attached form
entitled "Requirements Status and
Registrant's Response."

279-3013

X

N/A

N/A

279-3188

X

N/A

N/A

279-3336

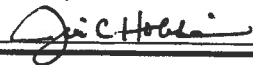
X

N/A

N/A

8. Certification: I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.

Signature and Title of Company's Authorized Representative



Jill Holihan, Product Registration & Regulatory Affairs Mgr

9. Date

5/2/2012

10. Name of Company FMC Corporation

11. Phone Number 215-299-6436

United States Environmental Protection Agency
Washington, D.C. 20460
REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

OMB Approval 2070-0174

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address FMC CORP. AGRICULTURAL PRODUCTS GROUP 1735 MARKET ST, RM 1978 PHILADELPHIA, PA 19103		2. Case # and Name 2510 - Permethrin Chemical # and Name: 109701 Permethrin				3. Date and Type of DCI and Number 01-Feb-2012 GENERIC ID # GDCl-109701-1113			
4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
875.1700	Applicator Exposure Data Requirements (Conventional Chemical) Product Use Information (1, 2)	Y				A,B,C,H,I,K,M,O,Q,R,S, T,II	TEP	24	2
10. Certification: I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law. Signature and Title of Company's Authorized Representative <u>Jill C. Holihan</u> Product Registration & Regulatory Affairs Manager							11. Date 5/2/2012		
12. Name of Company FMC Corporation							13. Phone Number 215-299-6436		

United States Environmental Protection Agency
Washington, D.C. 20460

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 2510 - Permethrin

DCI Number: GDCI-109701-1113

Key: Residue of Concern = Residue of Concern; TEP = Typical End Use Product [TEP]; TGAI = Technical Grade Active Ingredient [TGAI]; TGAI/PAIRA = Technical Grade of the Active Ingredient or Pure Active Ingredient, Radio Labelled; TGAI, TEP = Technical Grade of the Active Ingredient or Technical End-Use Product; TGAI/PAI = Technical Grade Active Ingredient, Pure Active Ingredient

Use Categories Key:

A - Terrestrial food crop

B - Terrestrial feed crop

C - Terrestrial nonfood crop

H - Greenhouse food crop

I - Greenhouse nonfood crop

K - Residential

M - Indoor nonfood use

O - Residential Indoor use

Q - Residential outdoor use

R - Agricultural premises and equipment

S - Food handling/storage establishments premises and equipment

T - Commercial, institutional and industrial premises and equipment

U - Residential Use Conventional Chemical

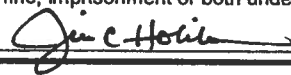
Footnotes: The following footnotes are referenced in column two (5. Study Title) of the Requirements Status and Registrant's Response form. These footnotes apply in addition to any test notes included in 40 CFR Part 158 with respect to the particular data requirement.

- 1 Product Use Information - The Agency is requiring residential pyrethroid use information to address probabilistic human health risk assessment for the pyrethroid chemical class and inform exposure assessment for estimating ecological risks. In the past, the Residential Exposure Joint Venture (REJV) developed a residential product use survey in the late 1990's as a vehicle to address FIFRA re-registration and FFDCA tolerance reassessment. The type of use information the Agency is now requiring must include a number of residential use parameters for pyrethroid pesticides, such as: identification of relevant target pest(s) and location of treatment (indoor/outdoor) per active ingredient and formulation type, the typical values (and ranges) of residential pyrethroid application rates (per active ingredient and product formulation type), the specific use patterns in which pyrethroids are applied, the types of application equipment used, co-occurrence data (e.g., application of same active ingredient to address separate pest issues by a resident or Pest Control Operator). Time-based parameters required to be included are the timing of residential pyrethroid applications (i.e., the typical values (and ranges) of re-treatment intervals for given application types) per day and season, and exposure time per application activity for the active ingredient and formulation type. Additionally, the geographic distribution of pyrethroid pesticide usage is required to be reflected in residential product use profile database.
- 2 Registrants must submit a protocol outlining the design and conduct of the study and receive Agency approval. A pilot or focus group is required to ensure the data collection feasibility for the final survey design.

United States Environmental Protection Agency
Washington, D.C. 20460
DATA CALL-IN RESPONSE

OMB Approval 2070-0174

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address FMC CORP. AGRICULTURAL PRODUCTS GROUP 1735 MARKET ST, RM 1978 PHILADELPHIA, PA 19103		2. Case # and Name Chemical # and Name: 129064 Zeta-Cypermethrin		3. Date and Type of DCI and Number 01-Feb-2012 GENERIC ID # GDCl-129064-1097	
4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data Requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirement on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirement on the attached form entitled "Requirements Status and Registrant's Response."
279-3124			X	N/A	N/A
279-3250			X	N/A	N/A
279-3260			X	N/A	N/A
279-3296			X	N/A	N/A
279-3341			X	N/A	N/A
279-9548			X	N/A	N/A
8. Certification: I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.					9. Date 5/2/2012
Signature and Title of Company's Authorized Representative  Jill Holihan, Product Registration & Reg. Affairs Mgr.					
10. Name of Company FMC Corporation					11. Phone Number 215-299-6436

United States Environmental Protection Agency
Washington, D.C. 20460
REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

OMB Approval 2070-0174

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1. Company Name and Address FMC CORP. AGRICULTURAL PRODUCTS GROUP 1735 MARKET ST, RM 1978 PHILADELPHIA, PA 19103		2. Case # and Name Chemical # and Name: 129064 Zeta-Cypermethrin				3. Date and Type of DCI and Number 01-Feb-2012 GENERIC ID # GDCI-129064-1097			
4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
875.1700	Applicator Exposure Data Requirements (Conventional Chemical) Product Use Information (1, 2)	Y				A,B,C,H,I,K,M,O,Q,R,S, T,II	TEP	24	2
10. Certification: I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.									
Signature and Title of Company's Authorized Representative <u>Jill C Holihan</u> Jill Holihan Product Registration & Reg. Affairs Mgr.							11. Date 5/2/2012		
12. Name of Company FMC Corporation							13. Phone Number 215-299-6436		

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Washington, D.C. 20460
DATA CALL-IN RESPONSE

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INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address FMC CORP. AGRICULTURAL PRODUCTS GROUP 1735 MARKET ST, RM 1978 PHILADELPHIA, PA 19103		2. Case # and Name 2130 - Cypermethrin Chemical # and Name: 109702 Cypermethrin		3. Date and Type of DCI and Number 01-Feb-2012 GENERIC ID # GDCI-109702-1107	
4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data Requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirement on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirement on the attached form entitled "Requirements Status and Registrant's Response."
279-3275 279-3292			X X	N/A N/A	N/A N/A
8. Certification: I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law. Signature and Title of Company's Authorized Representative <u>Jill Holihan</u> Jill Holihan, Product Registration & Reg. Affairs Mgr.				9. Date 5/2/2012	
10. Name of Company FMC Corporation				11. Phone Number 215-299-6436	

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1. Company Name and Address FMC CORP. AGRICULTURAL PRODUCTS GROUP 1735 MARKET ST, RM 1978 PHILADELPHIA, PA 19103		2. Case # and Name 2130 - Cypermethrin Chemical # and Name: 109702 Cypermethrin			3. Date and Type of DCI and Number 01-Feb-2012 GENERIC ID # GDCL-109702-1107				
4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
875.1700	Applicator Exposure Data Requirements (Conventional Chemical) Product Use Information (1, 2)	Y				A,B,C,H,I,K,M,O,Q,R,S,T,II	TEP	24	2
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12. Name of Company FMC Corporation							13. Phone Number 215-299-6436		

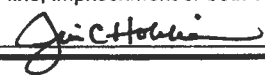
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DATA CALL-IN RESPONSE

OMB Approval 2070-0174

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address FMC CORP. AGRICULTURAL PRODUCTS GROUP 1735 MARKET ST, RM 1978 PHILADELPHIA, PA 19103	2. Case # and Name N/A - Bifenthrin Chemical # and Name: 128825 Bifenthrin	3. Date and Type of DCI and Number 31-Jan-2012 GENERIC ID # GDCI-128825-1114
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4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data Requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirement on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirement on the attached form entitled "Requirements Status and Registrant's Response."
279-3055			X	N/A	N/A
279-3160			X	N/A	N/A
279-3190			X	N/A	N/A
279-3294			X	N/A	N/A
279-3341			X	N/A	N/A

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4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
875.1700	Applicator Exposure Data Requirements (Conventional Chemical) Product Use Information (1, 2)	Y				A,B,C,H,I,K,M,O,Q,R,S, T,II	TEP	24	2
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12. Name of Company FMC Corporation							13. Phone Number 215-299-6436		

United States Environmental Protection Agency
Washington, D.C. 20460

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: N/A - Bifenthrin

DCI Number: GDCI-128825-1114

Key: Residue of Concern = Residue of Concern; TEP = Typical End Use Product [TEP]; TGAi = Technical Grade Active Ingredient [TGAi]; TGAi/PAIRA = Technical Grade of the Active Ingredient or Pure Active Ingredient, Radio Labelled; TGAi, TEP = Technical Grade of the Active Ingredient or Technical End-Use Product; TGAi/PAI = Technical Grade Active Ingredient, Pure Active Ingredient

Use Categories Key:

A - Terrestrial food crop

B - Terrestrial feed crop

C - Terrestrial nonfood crop

H - Greenhouse food crop

I - Greenhouse nonfood crop

K - Residential

M - Indoor nonfood use

O - Residential indoor use

Q - Residential outdoor use

R - Agricultural premises and equipment

S - Food handling/storage establishments premises and equipment

T - Commercial, institutional and industrial premises and equipment

U - Residential Use Conventional Chemical

Footnotes: The following footnotes are referenced in column two (5. Study Title) of the Requirements Status and Registrant's Response form. These footnotes apply in addition to any test notes included in 40 CFR Part 158 with respect to the particular data requirement.

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